

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

RALPH STRANO, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

KIPLINGER WASHINGTON
EDITORS, INC,

Defendant.

Case No. 21-cv-12987-TLL-PTM

JOINT STATUS REPORT

Plaintiff Ralph Strano (“Plaintiff”) and Defendant Kiplinger Washington Editors, Inc. (“Kiplinger,” together with Plaintiff, the “Parties”) submit this joint status report pursuant to the Court’s March 7, 2022 Order (ECF No. 13) to update the Court on the status of their settlement negotiations.

Over the past several weeks, the Parties have engaged in good faith settlement negotiations at arm’s-length and have made progress on a potential resolution to this matter. To that end, the Parties have agreed to participate in a private mediation with The Honorable Gerald E. Rosen (Ret.), former Chief Judge of this District and now with JAMS in Detroit. The mediation is scheduled to be conducted on May 31, 2022. Accordingly, the Parties jointly request that the Court continue the stay of this action to allow them to focus their efforts on the upcoming mediation. The Parties propose that they file a joint status report on or before June 3, 2022, to update the

Court on the status of their settlement negotiations, including whether a date should be set for Defendant to answer or otherwise respond to the First Amended Complaint.

/s/ Philip L. Fraietta

BURSOR & FISHER, P.A.

Joseph I. Marchese

Philip L. Fraietta (P85228)

888 Seventh Avenue

New York, New York 10019

(646) 837-7150

jmarchese@bursor.com

pfraietta@bursor.com

THE MILLER LAW FIRM, P.C.

E. Powell Miller (P39487)

Sharon S. Almonrode (P33938)

950 W. University Drive, Suite 300

Rochester, MI 48307

(248) 841-2200

epm@millerlawpc.com

ssa@millerlawpc.com

HEDIN HALL LLP

Frank S. Hedin

Arun G. Ravindran

1395 Brickell Ave, Suite 1140

Miami, FL 33131

(305) 357-2107

fhedin@hedinhall.com

aravindran@hedinhall.com

Attorneys for Plaintiff

/s/ David C. Anderson (w/ permission)

COLLINS EINHORN FARRELL PC

David C. Andersen (P55258)

4000 Town Center, 9th Floor

Southfield, MI 48075

(248) 355-4141

David.Anderson@ceflawyers.com

RUBIN, WINSTON, DIERCKS,

HARRIS & COOKE, LLP

Walter E. Diercks (admission pending)

1250 Connecticut Avenue, NW, Suite

700

Washington, DC 20036

(202) 861-0870

wdiercks@rwdhc.com

Attorneys for Defendant

Dated: April 20, 2022